

United States District Court
Eastern District of Texas, Sherman Division

FILED

JUN 24 2024

Clerk, U.S. District Court
Texas Eastern

JUNE 24, 2024

NELSON WILLIS,
Plaintiff,

v.

ADAM M. ARON,
Defendant

Case No.: 4:23-CV-732-ALM-KPJ

MOTION TO UNSEAL DOCUMENTS AND EVIDENCE:
IN THE CAUSE OF UNITED STATES V. SAKOYA BLACKWOOD
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Case 1:22-cr-00460-JMF

THE HONORABLE DISTRICT JUDGE AMOS LOUIS MAZZANT, III

Plaintiff, Nelson Willis, representing himself pro se, respectfully moves this Court for an order unsealing certain documents and photos from the case United States v. Sakoya Blackwood in the Southern District of New York, and states as follows:

1. ****Introduction:****

- This motion seeks the unsealing of specific documents and photos submitted in United States v. Sakoya Blackwood, which are crucial to the Plaintiff's case in the Eastern District of Texas, Sherman Division.

2. ****Background:****

- In the Southern District of New York case United States v. Sakoya Blackwood, Defendant Adam Aron was involved in sending explicit photos to Sakoya Blackwood. These documents were subsequently sealed by the court. The Plaintiff is now litigating against Adam Aron in the Eastern District of Texas for allegations including fraud, misconduct, and other violations.

3. ****Legal Basis for Request:****

- ****Right to a Fair Trial:**** The Sixth Amendment of the U.S. Constitution guarantees the right to a fair trial, which includes the ability to access evidence that is critical to one's defense.

- ****Public Access to Judicial Records:**** There is a common law right of access to judicial records and documents. This right is recognized to promote transparency and accountability in the judicial process (Nixon v. Warner Communications, Inc., 435 U.S. 589, 597-99 (1978)).
- ****Federal Rules of Civil Procedure:**** Under Rule 26(b)(1), parties may obtain discovery regarding any non-privileged matter that is relevant to any party's claim or defense and proportional to the needs of the case.

4. ****Relevance:****

- The sealed documents and photos are directly relevant to establishing a pattern of behavior and misconduct by Adam Aron, which is central to the Plaintiff's claims. These documents will demonstrate inconsistencies and deceit that are crucial for the Plaintiff's case.

5. ****Public Interest:****

- The public interest in the integrity of legal proceedings and the necessity for a fair trial in the Plaintiff's case outweighs the need for confidentiality in this instance. Transparency is essential to ensure justice is served and to uphold the integrity of the judicial process.

6. ****Protective Order:****

- To address privacy concerns, the Plaintiff requests that this Court issue a protective order limiting the disclosure and use of the unsealed documents to the present litigation. This protective order can ensure that the documents are only used for the purposes of the Plaintiff's case and are not publicly disclosed beyond what is necessary for legal proceedings.

7. ****Constitutional Rights:****

- The Plaintiff's constitutional rights, including the right to face his accuser and the right to a fair trial, are at stake. The sealed evidence is imperative to challenge the credibility of key witnesses and to substantiate the Plaintiff's claims of misconduct and retaliation by Adam Aron.

8. ****Pro Se Representation:****

- The Plaintiff respectfully reminds this Court that pro se litigants are entitled to equal protection under the law and should not be disadvantaged due to their pro se status. Denying access to crucial evidence would not only violate the Plaintiff's constitutional rights but also undermine the principles of justice and fairness.

9. ****FBI Investigation Results:****

- The Court takes into consideration the findings of the FBI investigation, which are pertinent to the case and support the Plaintiff's claims. The results of the investigation are critical in establishing the context and veracity of the allegations against Defendant Aron.

10. ****SEC Response to FOIA Request:****

- The Court acknowledges the Plaintiff's filing of the FOIA request and the SEC's response, which confirms that AMC Entertainment Holdings, Inc. is under investigation. This information further substantiates the relevance and necessity of the requested documents for Plaintiff's case.

****Prayer for Relief:****

For the foregoing reasons, Plaintiff respectfully requests that this Court issue an order unsealing the specific documents and photos referenced herein from United States v. Sakoya Blackwood and grant such other and further relief as this Court deems just and proper.

Dated: June 24, 2024

****Respectfully submitted,****

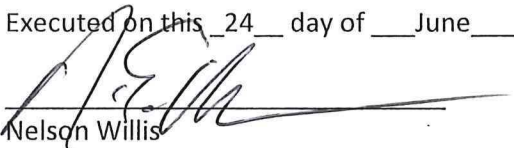


Nelson Willis
Pro Se Plaintiff
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****Verification:****

I, Nelson Willis, verify under penalty of perjury under the laws of the United States of America that the factual statements contained in this Motion to Unseal are true and correct to the best of my knowledge, information, and belief.

Executed on this 24 day of June, 2024.



Nelson Willis
Pro Se Plaintiff

United States District Court

Eastern District of Texas, Sherman Division

NELSON WILLIS,

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v.

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Certificate of Service

I, Nelson Willis, hereby certify that on June 24, 2024, a true and correct copy of the foregoing document was, by filing with the Clerk Of The Court, sent via electronically mail to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

A handwritten signature in black ink, appearing to read 'Nelson Willis', with a long horizontal line extending to the right.

Pro Se Litigant